

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF DELAWARE**

ORBIS OPPORTUNITY FUND, LP, a
Delaware Limited Partnership; ORBIS
OPPORTUNITY FUND (CAYMAN),
LP, a Cayman entity,

Plaintiffs,

v.

DAVID ALAN BOYER, an individual; SAVANNA
LEASING LLC, a Florida limited liability company;
ODYSSEY ENGINES, LLC,

Defendants.

C.A. No. 1:20-cv-00040-RGA

JOINT EXHIBIT LIST FOR TRIAL

The parties hereby submit the following list of exhibits that they presently intend to use at trial set to commence on May 15, 2023. Such exhibits do not include impeachment evidence.

EXHIBIT	DESCRIPTION	PLAINTIFFS' OBJECTION	DEFENDANT'S OBJECTION	ADMISSION
Exhibit 1	Email from Boyer to Max Shishlyannikov, dated May 7, 2017, with attachments			yes
Exhibit 2	Email from Alan Boyer to Vincent Ordonneau, dated May 10, 2017			yes
Exhibit 3	Limited Liability Company Agreement for Juno Engines US LLC			yes
Exhibit 4	Limited Liability Company Agreement for Juno Engines Cayman LLC			yes

EXHIBIT	DESCRIPTION	PLAINTIFFS' OBJECTION	DEFENDANT'S OBJECTION	ADMISSION
Exhibit 5	Written Resolutions of the Managing Member of the Company			yes
Exhibit 6	License Agreement between Juno Engines US and Savanna Leasing LLC			yes
Exhibit 7	Servicing Agreement between Savanna Leasing and Juno Engines US			yes
Exhibit 8	Servicing Agreement between Savanna Leasing and Juno Engines Cayman			yes
Exhibit 9	Engine Sale Agreement between PCB Aviation Holdings and Juno Engines US LLC, for JT8D-219 engines with serial number 696364			yes
Exhibit 10	Engine Warranty Bill of Sale for JT8D-219 engine serial number 696364 from PCB Aviation to Juno Engines US			yes
Exhibit 11	Engine Technical Acceptance Receipt for JT8D-219, with serial number 696364			yes
Exhibit 12	Form of Warranty Bill of Sale between KTTSC, Inc. and DVASH Aviation			
Exhibit 13	Aircraft Engine Lease Agreement between DVASH Aviation and Private Tock Company Ukraine			yes
Exhibit 14	Engine Sale Agreement between DVASH Aviation and Juno Engines Cayman, LLC, for CFM engine serial number 724382			yes

EXHIBIT	DESCRIPTION	PLAINTIFFS' OBJECTION	DEFENDANT'S OBJECTION	ADMISSION
Exhibit 15	Engine Warranty Bill of Sale for CFM engine serial number 724382 from DVASH Aviation to Juno Engines Cayman			yes
Exhibit 16	Engine Technical Acceptance Receipt for CFM, with serial number 724382			yes
Exhibit 17	Assignment, Assumption and Amendment Agreement, dated June 19, 2017, between Juno Engines Cayman LLC and Private Stock Company Ukraine, and DVASH Aviation Holdings, for CFM56-3C1, engine serial number 724382			yes
Exhibit 18	Form of Warranty Bill of Sale for engine serial number 725930, between JMD Aviation and Global Engine Maintenance			
Exhibit 19	JMD Aviation Holdings Aircraft Lease Agreement with Blue Air Airlines			yes
Exhibit 20	Engine Sale Agreement between JMD Aviation Holdings and Juno Engines Cayman, LLC, for CFM56-3C1 engine serial number 725930			yes
Exhibit 21	Engine Warranty Bill of Sale for CFM engine serial number 725930 from JMD Aviation to Juno Engines Cayman			
Exhibit 22	Engine Technical Acceptance Receipt for CFM, with serial number 725930			yes

EXHIBIT	DESCRIPTION	PLAINTIFFS' OBJECTION	DEFENDANT'S OBJECTION	ADMISSION
Exhibit 23	Assignment, Assumption and Amendment Agreement, dated June 19, 2017, between Juno Engines Cayman LLC and Blue Air Airline Management Solutions, for CFM56-3C1, Serial number 725930			yes
Exhibit 24	Warranty Bill of Sale, dated November 2016, between Kalitta Equipment and Roush Aviation, LLC, for engine serial number P726149v			yes
Exhibit 25	Engine Sale Agreement between Roush Aviation Services and Juno Engines US LLC, for JT8D-219 engines with serial number 726149			yes
Exhibit 26	Engine Warranty Bill of Sale for JT8D-219 engine serial number 726149 from Roush Aviation to Juno Engines US			
Exhibit 27	Engine Technical Acceptance Receipt for JT8D-219, with serial number 726149			yes
Exhibit 28	Aircraft Engine Bill of Sale between LCH and Roush dated 2016			
Exhibit 29	Aircraft Engine Lease Agreement between P.T. Airfast Indonesian and Savanna Leasing			yes
Exhibit 30	Engine Sale Agreement between Roush Aviation Services and Juno Engines Cayman, LLC, for JT8D-219 engine, with serial number P709880D			yes

EXHIBIT	DESCRIPTION	PLAINTIFFS' OBJECTION	DEFENDANT'S OBJECTION	ADMISSION
Exhibit 31	Engine Warranty Bill of Sale for JT8D-219 engine, with serial number P709880D from Roush Aviation to Juno Engines Cayman			yes
Exhibit 32	Engine Technical Acceptance Receipt for JT8D-219, with serial number P709880D			yes
Exhibit 33	Assignment, Assumption and Amendment Agreement, dated June 19, 2017, between Juno Engines Cayman LLC and P.T. Airfast Indonesia, for JT8D-219, Serial number P709880D			yes
Exhibit 34	Engine Bill of Sale between PCB Aviation and Roush Aviation, dated October 18, 2016			yes
Exhibit 35	Aircraft Engine Lease Agreement between P.T. Airfast Indonesia and PCB Aviation Holdings			yes
Exhibit 36	Engine Sale Agreement between PCB Aviation Holdings and Juno Engines Cayman, LLC, for JT8D-219 engine serial number P725604D			yes
Exhibit 37	Engine Warranty Bill of Sale for JT8D-219 engine serial number P725604D from PCB Aviation to Juno Engines Cayman			
Exhibit 38	Engine Technical Acceptance Receipt for JT8D-219, with serial number P725604D			yes

EXHIBIT	DESCRIPTION	PLAINTIFFS' OBJECTION	DEFENDANT'S OBJECTION	ADMISSION
Exhibit 39	Assignment, Assumption and Amendment Agreement, dated June 19, 2017, between Juno Engines Cayman LLC and P.T. Airfast Indonesia, for JT8D-219, Serial number P725604D			yes
Exhibit 40	Orbis Opportunity Fund (Cayman) Bank Statement for September 2017			yes
Exhibit 41	Orbis Opportunity Fund (Cayman) Bank Statement for November 2017			yes
Exhibit 42	Email string between Inna Zhuranskaya to Paul Pickett, et al., dated March 30, 2018 to April 17, 2018		Foundation; Hearsay	
Exhibit 43	Email string between Inna Zhuranskaya and Paul Pickett, et al., dated March 30, 2018 to May 9, 2018		Foundation; Hearsay	
Exhibit 44	Email from Inna Zhuranskaya to Paul Pickett, et al., dated June 2, 2018		Foundation; Hearsay	yes
Exhibit 45	Email from Paul Pickett to Inna Zhuranskaya, dated June 11, 2018		Foundation; Hearsay	yes
Exhibit 46	Email from Alan Boyer to Inna Zhuranskaya, dated June 29, 2018		Foundation; Hearsay	yes
Exhibit 47	Email from Alan Boyer to Inna Zhuranskaya, dated June 29, 2018		Foundation; Hearsay	
Exhibit 48	Membership Interest Purchase Agreement			yes

EXHIBIT	DESCRIPTION	PLAINTIFFS' OBJECTION	DEFENDANT'S OBJECTION	ADMISSION
Exhibit 49	Email dated July 11, 2018, between Jay Gould and Alan Boyer			
Exhibit 50	Email string dated July 16, 2018 from John Alexander to Steve Glauberman		Foundation; Hearsay	yes
Exhibit 51	Email dated August 6, 2018 from Evan Kass to Alan Boyer with attachment			yes
Exhibit 52	Aircraft Engine Purchase Agreement between Savanna Leasing, LLC and Jet Engine Investors II, LP			yes
Exhibit 53	Amendment #01 to Aircraft Engine Purchase Agreement			yes
Exhibit 54	mba morten beyer & agnew Extended Desktop Appraisal of Sixty-Six (66) JT8 Engines & Ten (10) CFM56-3Ca Engines (November 13, 2017)	Hearsay		yes
Exhibit 55	mba morten beyer & agnew Extended Desktop Appraisal of Seventy-Five (75) Pratt and Whitney JT8 Engines (May 21, 2018)	Hearsay		
Exhibit 56	Letter from TIAA to Odyssey Engines, LLC dated August 11, 2017	Document never was produced to Plaintiffs; Hearsay		
Exhibit 57	Stock Purchase Agreement between OSCODA Engine Services Corp, TIMCO Aviation Services, Inc., and TICO Engine Center, Inc. dated February 27, 2018			
Exhibit 58	HAECO Americas Engine Services Appraisal Report (April 20, 2018)	Hearsay; Relevance		

EXHIBIT	DESCRIPTION	PLAINTIFFS' OBJECTION	DEFENDANT'S OBJECTION	ADMISSION
Exhibit 59	Engine Mortgage, Security Agreement and Lease Assignment dated as of December 1, 2017 between Savanna Leasing II LLC and Wells Fargo Bank Northwest, N.A.	Document never was produced to Plaintiffs; Relevance		
Exhibit 60	Loan and Security Agreement dated as of December 1, 2017 between Savanna Leasing II LLC and Wells Fargo Bank Northwest, N.A.	Document never was produced to Plaintiffs; Relevance		
Exhibit 61	Defendant Boyer's Responses to Plaintiffs' Requests for Admissions			
Exhibit 62	Servicing Agreement among Savanna Leasing, LLC, and Juno Engines Cayman LLC (June 19, 2017)	Document never was produced to Plaintiffs, potentially same as Exhibit 7		
Exhibit 63	Engine Sale Agreement between PCB Aviation Holdings, LLC and Juno Engines US, LLC (June 9, 2017)	Document never was produced to Plaintiffs, potentially same as Exhibit 9		
Exhibit 64	Engine Sale Agreement between Roush Aviation Services, LLC and Juno Engines US, LLC (July 8, 2017, 2017)	Document never was produced to Plaintiffs, potentially same as Exhibit 25		
Exhibit 65	mba morten beyer & agnew Extended Desktop Appraisal of Sixty-Six (66) JT8 Engines (December 1, 2017)	Document never was produced to Plaintiffs; Hearsay; Relevance		
Exhibit 66	Gilchrist Aviation Law Legal Opinion dated August 16, 2018	Document never was produced to Plaintiffs; Hearsay; Foundation; Relevance		

EXHIBIT	DESCRIPTION	PLAINTIFFS' OBJECTION	DEFENDANT'S OBJECTION	ADMISSION
Exhibit 67	Supplement No. 4 to Engine Mortgage Security Agreement and Lease Agreement between Savanna Leasing LLC and Wells Fargo Bank Northwest, N.A. (August 16, 2018)	Document never was produced to Plaintiffs; Foundation; Hearsay; Relevance		
Exhibit 68	Engine Mortgage, Security Agreement and Lease Assignment dated as of December 1, 2017 between Savanna Leasing II LLC and Wells Fargo Bank Northwest, N.A.	Document never was produced to Plaintiffs; Hearsay; Relevance		
Exhibit 69	Financing Agreement between Odyssey Engines LLC and Q Charger (August 12, 2015)	Document never was produced to Plaintiffs; Foundation; Hearsay; Relevance		
Exhibit 70	QCharger - Odyssey - Collateral Release Instrument No. 1 (December 1, 2017)	Document never was produced to Plaintiffs; Foundation; Hearsay; Relevance		
Exhibit 71	QCharger - Odyssey - Collateral Release Instrument No. 1 (December 1, 2017)	Document never was produced to Plaintiffs; Foundation; Hearsay; Relevance		
Exhibit 72	Second Omnibus Amendment Agreement between Odyssey Engines LLC, Turbine Engine Center, Inc., Savanna Leasing LLC and Qcharger (December 1, 2017)	Document never was produced to Plaintiffs; Foundation; Hearsay; Relevance		
Exhibit 73	Mortgage and Security Agreement between Odyssey Engines, LLC, Turbine Engine Center, Inc., Air Transport Technologies, Inc., Savanna Leasing LLC and	Document never was produced to Plaintiffs; Foundation; Hearsay; Relevance		

EXHIBIT	DESCRIPTION	PLAINTIFFS' OBJECTION	DEFENDANT'S OBJECTION	ADMISSION
	Q Charger (August 12, 2015)			
Exhibit 74	General Security Agreement Odyssey Engines, LLC, Turbine Engine Center, Inc., Air Transport Technologies, Inc., Savanna Leasing LLC and Q Charger (August 12, 2015)	Document never was produced to Plaintiffs; Foundation; Hearsay; Relevance		
Exhibit 75	Term Sheet- Delta - commitment letter (August 17, 2017)	Document never was produced to Plaintiffs; Foundation; Hearsay; Relevance		
Exhibit 76	TIAA-Savanna Leasing II (Delta) Pledge and Security Agreement (December 1, 2017)	Document never was produced to Plaintiffs; Foundation; Hearsay; Relevance		
Exhibit 77	Ukraine Aircraft Engine Lease Agreement	Document never was produced to Plaintiffs, potentially the same as Exhibit 13; Hearsay;		
Exhibit 78	Aircraft Engine Lease General Terms Agreement between Delta Airlines, Inc. and Savanna Leasing (July 1, 2014)	Document never was produced to Plaintiffs		
Exhibit 79	Delta Lease Amendment 1	Document never was produced to Plaintiffs		
Exhibit 80	Delta Lease Amendment 2	Document never was produced to Plaintiffs		
Exhibit 81	Delta Lease Amendment 3	Document never was produced to Plaintiffs		
Exhibit 82	Engine Sales Agreement between Roush Aviation Services and PCB Aviation Holdings, LLC (October 18,	Document never was produced to Plaintiffs, potentially the		

EXHIBIT	DESCRIPTION	PLAINTIFFS' OBJECTION	DEFENDANT'S OBJECTION	ADMISSION
	2016)	same as Exhibit 34		
Exhibit 83	Equipment Sale and Purchase Agreement between Jet Engine Technology and PCB Aviation Holdings, LLC (August 18, 2016)	Document never was produced to Plaintiffs		
Exhibit 84	Jet Engine Technology Bill of Sale	Document never was produced to Plaintiffs		
Exhibit 85	Aircraft Engine Sale Agreement between LCH Trading Inc, and Roush Aviation Services, LLC (February 8, 2016)	Document never was produced to Plaintiffs, potentially same as Exhibit 28		
Exhibit 86	Engine Sale and Purchase Agreement between KTTSC, Inc. and DVASH Aviation Holdings, LLC (March 22, 2017)	Document never was produced to Plaintiffs. Potentially same as Exhibit 12		
Exhibit 87	Bill of Sale between Roush Aviation Services, LLC and PBC Aviation Holdings, LLC (October 18, 2016)	Document never was produced to Plaintiffs, potentially same as Exhibit 34		
Exhibit 88	Engine Sale and Purchase Agreement between JMD Aviation Holdings, LLC and Global Engine Maintenance, LLC (February 27, 2017)	Document never was produced to Plaintiffs, potentially same as Exhibit 18		
Exhibit 89	Engine Purchase Agreement between Kalitta Equipment and Roush Aviation, LLC (November 21, 2016)	Document never was produced to Plaintiffs, potentially same as Exhibit 24		
Exhibit 90	Engine Sale and Purchase Agreement between KTTSC, Inc. and JMD Aviation Holdings, LLC (March 2017)	Document never was produced to Plaintiffs, potentially same as Exhibit 12		
Exhibit 91	Delta Lease Amendment 4	Document never was produced to Plaintiffs		

EXHIBIT	DESCRIPTION	PLAINTIFFS' OBJECTION	DEFENDANT'S OBJECTION	ADMISSION
Exhibit 92	Delta Lease Amendment 5	Document never was produced to Plaintiffs		
Exhibit 93	Delta Lease Amendment 6	Document never was produced to Plaintiffs		
Exhibit				
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Exhibit				
Exhibit				

DATED: May 4, 2023

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